

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Sean Crawford,

Debtor.

Case No. 23-10866-pmm

Chapter 13

Objection to ECF No. 53

**Debtor's Objection to Motion for Relief from the Automatic Stay**

Debtor Sean Crawford, by his attorney, hereby objects to the Motion for Relief from the Automatic Stay filed by Movant SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust. The Court must deny the Motion for the following reasons:

1. The purported arrearage is inconsequential.
2. The Debtor can satisfy the purported arrearage by making curative payments to the Movant through the plan.
3. The Debtor can satisfy the purported arrearage by making curative payments directly to the Movant in a timely manner.

As a result, no grounds for relief exist and the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: April 12, 2024

CIBIK LAW, P.C.

*Attorney for Debtor*

By: 

Michael I. Assad (#330937)

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

215-735-1060

help@cibiklaw.com

**Certificate of Service**

I certify under penalty of perjury that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 12, 2024



Michael I. Assad

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Sean Crawford,

Debtor.

Case No. 23-10866-pmm

Chapter 13

Related to ECF No. 53

**Order Denying Motion for Relief from the Automatic Stay**

The Court having considered the Motion for Relief from the Automatic Stay (ECF No. 53) filed by SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Dwelling Series IV Trust, and after notice and opportunity for hearing, it is hereby **ORDERED** that:

1. The motion is **DENIED**.

Date:

---

Patricia M. Mayer  
U.S. Bankruptcy Judge